

AO 91 (Rev. 11/11) Criminal Complaint

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UNITED STATES DISTRICT COURT
for the
Eastern District of Michigan

United States of America
v.

Tanadia Younger,
aka Tanandia Younger

Case No. Case: 2:23-mj-30030
Assigned To : Unassigned
Assign. Date : 1/25/2023
CMP USA V YOUNGER (LH)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of Various dates in February 2020 in the county of Wayne in the
Eastern District of Michigan, the defendant(s) violated:

Code Section
Title 18 U.S.C. § 1591

Offense Description
Sex trafficking of a minor

This criminal complaint is based on these facts:

☒ Continued on the attached sheet.


Complainant's signature

Indasha Gray, Task Force Officer, FBI
Printed name and title

Sworn to before me and signed in my presence.

Date: January 25, 2023


Judge's signature

City and state: Detroit, Michigan

Hon. Anthony P. Patti, United States Magistrate Judge
Printed name and title

AFFIDAVIT IN SUPPORT OF CRIMINAL COMPLAINT

INTRODUCTION

I, Indasha Gray, being duly sworn, depose and state the following:

1. I am employed by the Southfield Police Department as a Police Officer and have been for approximately five (5) years. I have been assigned to the Federal Bureau of Investigation (FBI) as a Task Force Officer (TFO) since May of 2021. I currently work in the Southeast Michigan Trafficking and Exploitation Crimes (SEMTEC) Task Force. I have experience investigating child sexual exploitation and human trafficking crimes and have also been trained specifically on these types of investigations. I have consulted with numerous other SEMTEC agents, including those that have worked on human trafficking investigations for many years.

2. This affidavit is made in support of an application for a criminal complaint and arrest warrant for **TANADIA YOUNGER** (DOB 11/XX/1999), also known as Tanandia YOUNGER and “Kash,” for violations of 18 U.S.C. § 1591(a)(1) and (b)(2) (Sex Trafficking of a Minor). The information contained in this affidavit comes from my review of a forensic interview of JD, a minor born in 2004, that took place on February 27, 2020, police reports, court records, and from discussions with other law enforcement officers.

PROBABLE CAUSE

3. JD and MH, minors both born in 2004, met YOUNGER in early 2020. According to JD, YOUNGER arranged for JD to be picked up by a ride-sharing service and brought to YOUNGER's residence in Romulus, Michigan. MH was already there with YOUNGER. YOUNGER told JD and MH that she would arrange for "plays," that is, commercial sex dates with customers in exchange for money.

4. YOUNGER obtained photographs and videos of MH and JD and posted them to an online "dating" website used to advertise commercial sex dates. YOUNGER used her cell phone to post the ads and to correspond with customers. YOUNGER then arranged for customers to come to her residence in Romulus, Michigan. YOUNGER collected money from the customers and then the customers would engage in sex acts with either JD or MH. JD explained that YOUNGER would give each minor a portion of the payments and keep the rest for herself. This went on for several days, during which time JD stayed at YOUNGER's residence overnight.

5. JD left after a few days, but MH called her and asked her to return to YOUNGER's residence in early February 2020. There, JD met Samuel "Sincere" McCoy, YOUNGER's adult male associate. YOUNGER and McCoy took JD and MH to Toledo, Ohio, for the weekend. In Toledo, JD and MH performed commercial

sex dates that were arranged by McCoy and YOUNGER through more online advertisements. The group stayed in a hotel in Toledo that serves interstate travelers. After a couple days in Toledo, the group drove back to the Romulus area where they split up. MH went with YOUNGER and JD went with McCoy.

6. On or about February 20, 2020, the Genesee County Sherriff's Office (GCSO) began investigating a post on a dating/commercial sex website advertising what appeared to be three minor females for sex acts in exchange for money. The three minors were nude or semi-nude and appeared to be close to the age of 15 based on their appearance and physical development. The posts listed a contact number, which was later confirmed to belong to YOUNGER.

7. GCSO investigators, posing undercover as a customer, contacted YOUNGER through the advertisement. The investigators were then able to locate the girls at a motel in Flint, Michigan, that serves interstate travelers. On February 21, 2020, investigators watched five individuals, three of whom appeared to be teenagers, exit the motel into a car. GSCO officers stopped the car for speeding and found two adult females in the front and three minor females in the back, identified as the same girls in the online posting. One of the minors was MH again. YOUNGER was one of the front passengers and was arrested for child sex trafficking by GCSO.

8. YOUNGER's preliminary exam on state charges took place on May 26, 2021. All charges were bound over for trial in 7th Circuit Court, Flint, Michigan. At

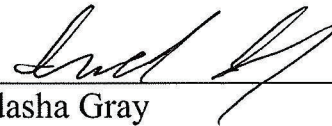
the preliminary exam, the other minor females, CP and MB, testified that they were asked by their friend, MH, if they wanted to make some money with her friend “Kash.” The girls both testified that YOUNGER drove them from Detroit up to Flint, took them to a hotel, took sexually explicit photographs of them using her phone, and then posted those online. The girls both testified that several men arrived at the hotel, engaged in sexual acts with one of the girls, and gave YOUNGER money for the sex acts. The two girls estimated that they engaged in sex acts with as few as three and as many as ten men, before YOUNGER was arrested as described above. CP testified that she was 16 at the time; MB stated that she was 14. MH refused to testify. YOUNGER’s state case remains pending in 7th Circuit Court and she has not been tried on any of the offenses described in this affidavit.

9. At all times described in this affidavit, YOUNGER was 20 years old and spent considerable time with MH, JD, and the other minors, including several driving trips and overnight stays, so she had a reasonable opportunity to observe them. Furthermore, I have viewed photographs of the minor victims taken near the time of these events and, based on my training and experience, their appearance was consistent with their ages, that is, 16 years old and younger.

CONCLUSION


10. For the reasons set forth above, I believe probable cause exists that **TANADIA YOUNGER**, did violate 18 U.S.C. § 1591 (Sex Trafficking of a Minor),

by knowingly enticing, recruiting, harboring, transporting, and advertising a minor in and affecting interstate commerce, knowing that the minor would be caused to engage in a commercial sex act, and knowing or in reckless disregard of the fact that each victim had not reached the age of 18, and after having had a reasonable opportunity to observe each victim.



Indasha Gray
Task Force Officer
Federal Bureau of Investigation

Sworn to before me and signed in my presence
and/or by reliable electronic means.



Anthony P. Patti January 25, 2023
United States Magistrate Judge